



State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Site Remediation and Waste Management Program

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CATHERINE R. McCABE
Commissioner

April 8, 2019

John Prince, Acting Director
Emergency & Remedial Response Division
United States Environmental Protection Agency
Region II
290 Broadway
Mail Code: 26th Fl
New York, New York 10007-1866

Re: Sampling for contaminants of emerging concern (a.k.a. Emerging Contaminants)

Dear Mr. Prince:

This letter is a follow-up to our meeting on September 20, 2018 when we discussed implementing an expanded sampling program for emerging contaminants at all National Priorities List (NPL) sites to determine their presence in groundwater and surface water at sites across the state. Please accept this letter as a formal request from the New Jersey Department of Environmental Protection (the Department) to the U.S. Environmental Protection Agency Region 2 Emergency & Remedial Response Division (EPA) to conduct a review of each EPA-Lead NPL site for the following contaminants in groundwater, surface water and site-related treatment systems:

- 1,4-dioxane
- perfluorononanoic acid (PFNA)
- perfluorooctanoic acid (PFOA)
- perfluorooctane sulfonic acid (PFOS)
- 1,2,3-trichloropropane (1,2,3-TCP)
- perchlorate

New Jersey recently promulgated Ground Water Quality Standards for 1,4-dioxane and perchlorate and a Maximum Contaminant Level (MCL) for PFNA and 1,2,3 TCP. The Department has just published Interim Specific Ground Water Quality Criteria for PFOA and PFOS; therefore, these contaminants should be considered Applicable or Relevant and Appropriate Requirements (ARARs) for any remedial action. These compounds also should be included in

any upcoming required Five-Year Review at NPL sites to ensure that any previously implemented site remedy remains protective.

The Department suggests that EPA prioritize sampling at sites where it is likely to find these compounds and receptors may be a concern. As you know, the Department has detected 1,4-dioxane at several landfill sites and at sites with chlorinated solvents, especially 1,1,1-trichloroethane. 1,2,3-TCP is most often associated with fumigants used in agriculture and is usually co-located with 1,2-dichloropropane (1,2-DCP). 1,2,3-TCP requires a special pesticide analysis, however, 1,2-DCP can be detected by a volatile organic compound (VOC) scan. Reviewing prior VOC analyses for any detection of 1,2-DCP would indicate a need to sample for 1,2,3-TCP. Perchlorate is not a routine analyte and requires a special analysis. It is primarily associated with agricultural use, but can also be found at industrial facilities such as the Shieldalloy NPL site and others where energetic compounds may be present.

Information on PFNA and other per- and polyfluoroalkyl substances (PFAS) compounds can be found at many different sites, and EPA and Interstate Technology & Regulatory Council guidance is available to identify the various industries and sites where these compounds are likely to be found. As we noted at the December 2018 meeting, Curtis Paper is a likely candidate for PFAS sampling based on the products they manufactured. Landfills and other sites where chemical wastes were disposed (e.g., BROS) should also be prioritized. The Department recommends that EPA analyze for the entire suite of PFAS compounds using revised EPA Method 537.1 as part of this effort to capture an expanded list of PFAS, including GenX.

Please let me know if you have any questions regarding this request. The Department would like to coordinate sampling of the NPL sites. Edward Putnam will be the Department lead for this effort; he can be contacted at (609) 984-9769 or Ed.Putnam@dep.nj.gov.

Sincerely,



Mark J. Pedersen
Assistant Commissioner
Site Remediation & Waste Management Program

C: Kenneth J. Kloo, Director DRM
David Haymes, Director, DETFS
Edward Putnam, Assistant Director, PFRE
Stephen Maybury, Bureau Chief, BCM
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